

1 **IRELL & MANELLA LLP**
Jonathan Kagan (70446)
2 JKagan@Irell.com
Joshua Glucoft (301249)
3 JGlucoft@Irell.com
1800 Avenue of the Stars, Suite 900
4 Los Angeles, California 90067-4276
Telephone: (310) 277-1010
5 Facsimile: (310) 203-7199

6 *Attorneys for Non-party*
Juniper Networks, Inc.

7
8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN JOSE DIVISION**

11 CISCO SYSTEMS, INC.,)	Case No. 5:14-cv-05344-BLF (PSG)
)	
12 Plaintiff,)	DECLARATION OF JOSHUA GLUCOFT
)	ON BEHALF OF NONPARTY JUNIPER
13 v.)	NETWORKS, INC. IN SUPPORT OF
)	CISCO SYSTEMS, INC.'S
14 ARISTA NETWORKS, INC.,)	ADMINISTRATIVE MOTION TO FILE
)	DOCUMENTS UNDER SEAL (DKT. NO.
15 Defendant.)	530)
)	
16)	Judge: Hon. Beth Labson Freeman
17)	
)	

DECLARATION OF JOSHUA GLUCOFT

I, Joshua Glucoft, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel for non-party Juniper Networks, Inc. (“Juniper”) with respect to the third-party subpoena served by defendant Arista Networks, Inc. (“Arista”) in the above-captioned matter. I am a member in good standing of the State Bar of California and have been admitted to practice before this Court. Where expressly indicated, I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I submit this declaration in support of Cisco Systems, Inc.’s (“Cisco”) Administrative Motion to File Documents Under Seal (Docket No. 530), which moves the Court for an order to file under seal, among other things, the following item related to non-party Juniper:

- Pages 178-79 and 187 of Exhibit 5 to the Jenkins Declaration (Dkt. No. 530-15).

In this declaration, I explain why the material cited above is sealable pursuant to Civil Local Rule 79-5 and provide additional facts in support of Cisco’s Administrative Motion to File Documents Under Seal to the extent that the administrative motion pertains to Juniper.

3. The redacted portions of the exhibit described above contain direct quotes and references to the transcript of the deposition of Philip Kasten as Juniper’s corporate designee pursuant to a subpoena served on Juniper by Arista. The transcript reflects substantive discussion of the technical underpinnings and development of Juniper’s highly proprietary software—which contains much information that Juniper maintains as trade secrets. Juniper expends significant effort in maintaining the secrecy of its software architecture and development, including, for example, implementing strict screening procedures for visitors to its engineering campus. Public disclosure of essential nonpublic facts about Juniper’s software could materially impair Juniper’s intellectual property rights and could cause serious competitive consequences to Juniper’s business positioning.

4. For these reasons, there is good cause to seal the redacted portions of the exhibits described above.

[Signature page follows]

1 Executed on September 20, 2016 in Los Angeles, California.

2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct to the best of my knowledge.

4

5

/s/ Joshua Glucoft

6

Joshua Glucoft

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28